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EMISSION MEASUREMENT CENTER  
GUIDELINE DOCUMENT

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HANDLING REQUESTS FOR APPROVAL OF MINOR/MAJOR  
MODIFICATIONS/ALTERNATIVES TO TESTING AND MONITORING METHODS OR  
PROCEDURES

## INTRODUCTION

The purposes of this interim guideline are (1) to discuss the Environmental Protection Agency (EPA) alternative test method and monitoring approval/disapproval procedures under 40 CFR Parts 60, 61, and 63 and (2) describe EPA procedures for requesting and responding to requests for approval of alternative test methods and monitoring procedures. The procedures describe both external and internal procedures and responsibilities associated with EPA's technical assistance and review authority roles. A more extensive version of this guideline is under development.

## BACKGROUND

The General Provisions to 40 CFR Parts 60, 61 and 63 (NSPS and NESHAP) give the Administrator of the EPA the authority to approve changes to testing and monitoring requirements specified by the Subparts of Parts 60, 61, and 63 for determining or assessing compliance of stationary sources with Federally enforceable emission limitations or standards. Many of the Subparts reiterate this authority.

Delegations 7-119 and 7-121 of EPA's Delegations Manual formally clarify that the authority for approval of (1) minor changes to test methods procedures, (2) shorter sampling times/smaller sampling volumes, (3) waivers of emissions and performance test requirements, and (4) all changes to monitoring requirements can be delegated to the Regional Administrators or a designee. Authority for approval of alternative methods or equivalent methods can be delegated only to the Director of the Office of Air Quality Planning and Standards (OAQPS).

In many cases, the Regional Administrators have delegated the authority to approve minor changes to test methods and monitoring procedures to the State or local agencies responsible for implementing the NSPS and NESHAP. The Director of OAQPS has further delegated responsibility for the authority for approval of major changes to test methods to the Director of the Emissions, Monitoring and Analysis Division (EMAD) who, in turn has delegated it to the Leader of the Source Measurement Technology Group.

As further clarification, our understanding is that this delegation should not be applied to programs operated under the Air Quality Strategies Division (AQSSD) Director's discretion (i.e., those completely delegated to State or local agencies with little or no EPA

oversight) nor to initial State Implementation Plan reviews. For these programs, the agency will provide specific guidance on what constitutes acceptable test methods through the regulation or associated guidance material (e.g., the Title IV background documentation).

#### ACCEPTANCE CRITERIA

A request for a major change to a test method or monitoring requirement and testing waivers will receive rigorous review. Basic principles of these reviews will be:

- (a) The change in the testing or monitoring method or procedure will provide a determination of compliance status at the same or higher stringency as the method or procedure specified in the applicable regulation; or
- (b) The compliance or conformance with an applicable emission limitation or standard has been sufficiently demonstrated by other means to justify the testing waiver.

In addition, the requester shall include the compelling reasons which prompted the request; that is, a request for any change should address significant deficiencies in applying the prescribed procedure or provide meaningful improvements achieved over existing procedures or methods. Examples of supporting reasons are as follows:

- (a) Overcoming significant interferences or biases (e.g., addition of an HCl-filled impinger to remove NH<sub>3</sub> from an SO<sub>2</sub> gas sample);
- (b) Allowing for new technology for improved accuracy, lower cost procedures, or increased applicability (e.g., use of dynamic calibration gas cells for in situ cross-stack continuous emission monitoring systems in lieu of a relative accuracy audit);
- (c) Allowing alternative measurement locations for hybrid processes subject to multiple regulations (e.g., alternative measurements and emission calculation procedures for combined cycle, gas turbine/fossil fuel-fired boiler units).

**Most importantly, acceptance of an alternative test method shall be based on substantive technical support information.** While chemistry, engineering, and economic evaluations will be important to the EMAD reviews, requests must also include support data of the type described in Method 301 of Appendix A, Title 40 Part 63. The promulgation of

Method 301 included the requirement that any non-validated method proposed for demonstrating conformance with a federal emission limitation or standard be subject to the requirements in Method 301. Supporting information includes:

- (a) direct comparisons with existing reference or compliance test methods;
- (b) precision and bias determinations (e.g., duplicate test trains and multiple test runs under a range of test conditions); and
- (c) detailed and documented test procedures (e.g., similar to published EPA reference methods).

#### CONTENT OF REQUEST

Requests must be made and approvals granted on a facility-specific basis. A complete letter of request should include:

- Name(s) and location(s) of facilities to which requested testing alternative is to apply.
- Federal testing requirement (e.g., subpart and paragraph of 40 CFR part 60, 61, or 63) to which facility is subject.
- Detailed description of alternative testing procedure(s).
- Justification for alternative testing procedure (see discussion in section on Acceptance Criteria above) including any supporting test data.
- Names of responsible state/local agency and EPA Regional contacts, if possible.

Questions regarding these procedures should be directed to Robin Segall (919/541-0893; segall.robin@epa.gov).

Send complete requests for review of alternative test methods to:

Dr. Connie B. Oldham, Leader  
Source Measurement Technology Group  
Emission Measurement Center  
U.S. EPA (D205-02)  
Research Triangle Park, NC 27711

Copies of the request should be sent to the responsible EPA Regional Office and state/local agency.